1 DOLLY M. TROMPETER, ESQ. 2 CA Bar ID No. 235784 Peña & Bromberg, PLC 3 2440 Tulare St., Suite 320 4 Fresno, CA 93721 Telephone: 415-271-8604 5 Fax: 866-282-6709 6 dolly@dollydisabilitylaw.com Attorney for Plaintiff 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 11 Case No. 1:23-cv-00940-BAM Aaron J Campos, 12 STIPULATION AND | PROPOSED |
ORDER FOR EXTENSION OF Plaintiff, 13 TIME VS. 14 Kilolo Kijakazi, Acting Commissioner of Social Security, 15 16 Defendant. 17 18 19 20 21 Pending the Court's approval, IT IS HEREBY STIPULATED, by and 22 between the parties through their respective counsel of record, with the Court's 23 approval, that Plaintiff shall have a 4-day extension of time, from November 20, 24 2023 to November 24, 2023, for Plaintiff to serve on defendant with 25 PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the 26 Court's Scheduling Order shall be extended accordingly. 27 This is Plaintiff's second request for an extension of time. Plaintiff 28 respectfully states that the requested extension is necessary due several merit briefs

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1	being due on the same week. For the weeks of November 20, 2023 and November	
2	27, 2023 Counsel has ten Merit briefs due. Counsel requires additional time to	
3	brief the issues thoroughly for the Court's consideration. Defendant does not	
4	oppose the requested extension. Counsel apologizes to the Defendant and Court	
5	for any inconvenience this may cause.	
6		
7		Respectfully submitted,
8	Dated: November 15, 2023	PENA & BROMBERG, ATTORNEYS AT LAW
10		
11		By: <u>/s/ Dolly M. Trompeter</u> DOLLY M. TROMPETER
12		Attorneys for Plaintiff
13		
14	Dated: November 15, 2023	PHILLIP A. TALBERT
15		United States Attorney MATHEW W. PILE
16		Associate General Counsel
17		Office of Program Litigation
18		Social Security Administration
19		
20		By: */s/ Edmund J. Darcher Edmund J. Darcher
21		Special Assistant United States Attorney
22		Attorneys for Defendant (*As outhorized by small on November 15, 2022)
23		(*As authorized by email on November 15, 2023)
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	I .	

ORDER

Pursuant to stipulation, and good cause appearing, Plaintiff's request for an extension of time to November 24, 2023, to file and serve Defendant with a Motion for Summary Judgment is GRANTED. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: November 16, 2023 /s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE